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July 29, 2013

Via E-mail (calderon.wanda@epa.gov)

Wanda Calderon
FOIA Specialist
United States Environmental Protection Agency
Region 2
290 Broadway, 26th Floor
New York, NY 10007

Re: EPA ID# NJD981557879 at 333 Hamilton Blvd., South Plainfield, NJ - EPA ID#
NJSFN0204260 at Woodbrook Road Dump

Dear Wanda:

Pursuant to the Freedom of Information Act, 5 U.S.C. §§ 552, *et seq.* ("FOIA"), this request concerns the Cornell-Dublier Electronics, Inc. ("CDE") superfund sites, located at 333 Hamilton Blvd., South Plainfield, NJ, EPA ID# NJD981557789 and the Woodbrook Road Dump in Edison South Plainfield, NJ, EPA ID# NJSFN0204260. On behalf of Exxon Mobil Corporation ("Exxon"), I hereby request the following reports, which are identified in the "References Cited" section of the report of David McDonald's attached as Exhibit 11 to the "United States Memoranda in Support of Motion to Enter the Consent Decree," specifically identified as Doc. 28-10 as filed with the U.S. District Court for the District of New Jersey on 4/11/13, in the action United States v. Cornell-Dublier Electronics, Inc., C.A. No. 12-cv-05407-JLL-MAH (D.N.J.):

- McDonald, D.D. and D.E. Smorong. 2008. **An assessment of injury to natural resources and associated damages to surface water and biological resources in the vicinity of the Cornell- Dubilier Electronics Inc. Superfund Site, South Plainfield N.J.** Prepared for the U.S. Department of Justice. Washington D.C. Prepared by MacDonald Environmental Sciences Ltd., Nanaimo, British Columbia in association with Industrial Economics Inc., Cambridge Massachusetts;

- **Louis Berger Group Inc and Malcolm Pirnie. 2011-unpublished data 2011-10-26 Bound Brook areas of potential PCB contamination. Figures and narrative descriptions provided by United States Department of Justice;**
- Delong, T.S. Ferson, T. Tucker, D. Moore, R. Breton, S. Teed, R. Thompson, G. Lawrence, R. McGrath, R. DiNitto, F. Langford, S. Svirsky, S. Campbell, J. Lortie, B. Roy and M. Thompson. 2004. **A Ecological risk assessment for General Electric (GE)/Housatonic river Site rest of river. Appendix F. Assessment Endpoint- Survival, growth and reproduction of fish.** Prepared for United States Army Corps of Engineers. New England District. Concord Massachusetts, and United States Environmental Protection Agency. New England Region. Boston, Massachusetts. Prepared by Weston Solutions, Inc. West Chester, Pennsylvania;
- Stantec Consulting Services Inc. 2008. **Wildlife species investigation of the Bound Brook ecosystem, South Plainfield New Jersey;**
- Valiela, D. 1984 - **Improving Predictive Performance and Usefulness of Biological Environmental Impact Assessment: Experimental Impact Studies and Adaptive Impact Assessments in Improving Impact Assessment**, S.L. Hart, G.A. Enk, W.F. Hornick (editors) Westview Press, London
- **Empirical data from the Anniston PCB site**, referenced on page 2.1 of the MacDonald Environmental Sciences Ltd. cited above.


FOIA requires the release of all reasonably segregable portions of information, which are not themselves exempt. *See* 5 U.S.C. § 552(b). If, for any reason, materials reasonably within the scope of this request are withheld as failing under FOIA exemption or exemptions covered by 5 U.S.C. § 552, please identify and describe, with specificity, each document being withheld, the basis for withholding it, and whether any exempt material can be deleted thereby allowing the document with deleted portions to be provided. We are aware of our rights to administrative appeal set forth in 5 U.S.C. § 552(a)(6)(A)(I) and are prepared to pursue them if necessary.

If you have any questions please contact me at (212) 513-3263. Your prompt attention to this request is appreciated.

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Very truly yours,

HOLLAND & KNIGHT LLP


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